

February 9, 2022

By ECF

The Honorable Mary Kay Vyskocil
United States District Judge
Southern District of New York
500 Pearl Street, Courtroom 18C
New York, New York, 10007

Re: Ciaramella, et al. v. Zucker,
No. 18 Civ. 6945 (MKV)

Dear Judge Vyskocil:

The undersigned counsel represents plaintiffs Frank Ciaramella, Lillian Velazquez, AnneMarie Walker, Antonio Martin, Christopher Russo, Matthew Adinolfi, Jody Virtuoso, Yvonne Hawkins, Blanca Coreas, and Brenda Perry on behalf of themselves and all others similarly situated (“Plaintiffs”) and Defendant Mary T. Bassett, in her capacity as Commissioner of the Department of Health (“Defendant” and, with Plaintiffs, the “Parties”). Pursuant to this Court’s January 10, 2022 Order (ECF 264), the Parties hereby submit this joint status letter.

The Parties continue to negotiate the terms of a proposed Stipulation of Settlement (“Proposed Stipulation”) and various exhibits thereto and anticipate making further progress toward an agreement over the next few weeks. Accordingly, the Parties respectfully propose to submit a further joint update on the status of the Proposed Stipulation and related matters on or before March 11, 2022.

Respectfully submitted,

/s/ Wesley R. Powell
Wesley R. Powell
Willkie Farr & Gallagher LLP
Counsel for Plaintiffs

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/s/ Rene Hertzog
Rene Hertzog¹
Assistant Attorney General
Counsel for Defendant

Cc: All counsel of record (by ECF)

¹ Defendant's counsel has provided Plaintiffs' counsel with authorization to sign this joint status report on Defendant's counsel's behalf.